

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

Atlas Uluslararası Kumanyacılık tic A.Ş
Atlas Gemi Vanalari ve Ekipmanlari Tic Ltd
Sti,
Plaintiffs,

vs.

M/V ARICA, IMO 9399741, its engines,
tackle and apparel,
Defendant in rem,

and

FS Arica, Ltd.,
Defendant in personam,

and

The Master of the M/V ARICA,
Garnishee.

CIVIL ACTION N.: 20-679-RGA
IN ADMIRALTY, Rule 9(h)

NETWORK SHIPPING LTD.,
Intervenor Plaintiff,

vs.

FS Arica, Ltd.,
Defendant,

and

The Master of the M/V ARICA,
Garnishee.

MOTION FOR DEFAULT JUDGMENT

Intervening Plaintiff Network Shipping Ltd (“Network”) hereby requests, pursuant to Fed. R. Civ. P. 55(b)(1), that default judgment be entered against Defendant M/V ARICA, IMO 9399741, in the amount of \$292,686.34, plus attorneys’ fees, interest and costs of at least \$25,000, for a total amount of \$317,686.34. As set forth in the accompanying Memorandum of Law, the conditions of Rule 55(b) have been satisfied and entry of default judgment is proper as a matter of law.

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Attorneys for Network Shipping Ltd.

Dated: July 6, 2020